

FILED
CLERK OF DISTRICT COURT
FEB 28 2006
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Nadine J. Griffin,
Accused, Belligerent Claimant

CASE NO. 05-cr-10175-WGY

**VERIFIED AFFIDAVIT AND
EXHIBITS IN SUPPORT OF
MOVE TO QUASH INDICTMENT**

Nadine J. Griffin, Affiant

1. Nadine J. Griffin declares and states as follows:
2. I am the accused Belligerent Claimant, hereinafter referred to as Affiant in the above-entitled action and competent to testify to the facts stated herein to wit:
3. That all statements made within this affidavit are true and correct not meant to mislead;
4. That Nadine J. Griffin exists as a conscious, living, breathing, flesh and blood sentient being, a woman; NOT a statutory person, persons, natural person, artificial person, individual, corporation, entity, or any other sub-status, fourth class citizen *ens legis* creation of any government, federal, state, local or otherwise;
5. That Affiant Nadine J. Griffin is unschooled in law, not an Attorney or Bar Association member, and is attempting to defend and dispose of this action to the best of Affiant's ability with reliance upon your statutes, codes, rules and regulations; including those relied

1 upon by the plaintiff and established by the Constitution of the United States of America,
2 United States Congress, and the United States Supreme Court;

3 6. That on or about July 13, 2005 Affiant was formally charged under cause number CR-05-
4 10175-WGY for alleged violations of 26 U.S.C. § 7206, two counts of filing a false returns
5 for the tax years 1998 and 1999 (see **Exhibit A**);

6 7. That Counts 1 and 2 of the indictment fails to provide enough information for Affiant to
7 prepare a proper defense;

8 8. That Counts 1 and 2 of the indictment does not describe a single overt act attributable to
9 Affiant that arises to the level of a criminal offense against the laws of the United States.

10 9. That Counts 1 and 2 of the indictment are wholly insufficient, overly broad and fails to state
11 the nature and cause of the accusation against Affiant;

12 10. That Counts 1 and 2 of the indictment are constitutionally defective on their face, void for
13 vagueness, factually insufficient and constitute a crime of belief - a thought crime;

14 11. That Counts 1 and 2 of the indictment are insufficient as a matter of law in violation of
15 Federal Rules of Criminal Procedure 7(c)(1) and the nature and cause of the accusation
16 clause of the Sixth Amendment;

17 12. That Affiant filed a move for bill of particulars on October 6, 2005 that was electronically
18 denied on October 13, 2005 by judicial official and CEO William G. Young;

19 13. That Affiant has been denied access to this Court by judicial official and CEO William G.
20 Young, a right to be informed of the nature and cause of the accusation, and a Right to a
21 Fair and impartial hearing and or trial at every turn and is unable to prepare a proper
22 defense for these reasons;

23 14. That Affiant cannot predict what future injustices and/or prejudices Affiant may continue to
24
25

suffer at the heavy hands of judicial official and CEO William G. Young treating Affiant to be of a lesser class than he – but Affiant will not be swayed and remain vigilant to insure her Rights be observed and respected by any lawful means available;

I, Nadine J. Griffin, declare under penalty of perjury as a Conscious, Thinking, Feeling, Living, Breathing, Flesh and Blood Sentient Being that the foregoing is true and correct. All Rights retained without recourse.

Executed this 27 day of February, 2006.

Signature: Nadine J. Griffin
Nadine J. Griffin, Affiant
c/o 36 Center Street, #143
Wolfeboro, New Hampshire [03894]

NOTARY ACKNOWLEDGMENT

State of New Hampshire)
County of Carroll) subscribed and sworn

On this 27 day, of February, 2006, Nadine J. Griffin personally appeared, personally known to me, or proved to me on the basis of satisfactory evidence to be the one whose name is subscribed to within this instrument and who did take an Oath.

Witness my hand and official seal.

Margaret L. Culverwell
Signature of Notary

My Commission Expires: _____

ATTACHMENTS:

Exhibit A: Indictment of July 13, 2005

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

NADINE J. GRIFFIN,

Defendant.

26 U.S.C. § 7206(1)

(Filing False Income Tax Returns)

CR-05-10175-WGY

INDICTMENT

The Grand Jury Charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. The defendant, NADINE J. GRIFFIN, is a United States Citizen and was a resident of Danvers, Massachusetts.
2. From in or about 1996 through at least 1999, defendant NADINE J. GRIFFIN was a salesperson for Global Prosperity.
3. Global Prosperity was an organization founded in 1996, which was in the business of selling a 12-part audiotape/compact disc series, as well as tickets to offshore seminars located in such places as Aruba and Cancun, Mexico. Global Prosperity was known by various names including Global Prosperity Marketing Group, the Global Prosperity Group, and the Institute of Global Prosperity (hereinafter referred to as "Global Prosperity").
4. As a salesperson for Global Prosperity, Nadine J. Griffin sold the following goods and services:

- a. Global 1 (G1): a 12-part audiotope/compact disc series retail priced at \$1,250 per series.
 - b. Global 2 (G2): a seminar ticket to a three-day offshore seminar retail priced at \$6,250 per ticket.
 - c. Global 3 (G3): a seminar ticket to a five-day offshore seminar retail priced at \$18,750 per ticket.
5. Global Prosperity primarily marketed and sold its products through a network of distributors or salespersons modeled after the multi-level marketing design.

The Grand Jury further charges:

COUNT 1
26 U.S.C. § 7206(1)
(Filing False Income Tax Returns)

6. On or about July 30, 1999, in the District of Massachusetts, defendant NADINE J. GRIFFIN, who was a resident of Danvers, Massachusetts, did willfully make and subscribe a 1998 U.S. Individual Income Tax Return, Form 1040, for the calendar year 1998, which was verified by a written declaration that it was made under the penalties of perjury and which was filed with the Internal Revenue Service, and which said income tax return defendant NADINE J. GRIFFIN did not believe to be true and correct as to every material matter in that the said 1998 income tax return reported Schedule C gross receipts of \$31,348.01, whereas, defendant NADINE J. GRIFFIN then and there well knew and believed, that defendant failed and omitted to disclose on the said 1998 income tax return and attached Schedule C, or any other Schedule C, or otherwise, a substantial amount of gross receipts from her business activity as a salesperson for Global Prosperity.

All in violation of Title 26, United States Code, Section 7206(1).

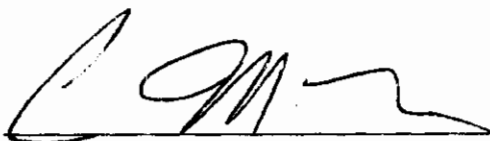
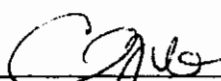
The Grand Jury further charges:

COUNT 2
26 U.S.C. § 7206(1)
(Filing False Income Tax Returns)

7. On or about April 12, 2000, in the District of Massachusetts, the defendant NADINE J. GRIFFIN, who was a resident of Danvers, Massachusetts, did willfully make and subscribe a 1999 U.S. Individual Income Tax Return, Form 1040, for calendar year 1999, which was verified by a written declaration that it was made under the penalties of perjury and which was filed with the Internal Revenue Service, and which said income tax return defendant NADINE J. GRIFFIN did not believe to be true and correct as to every material matter in that the said 1999 income tax return reported Schedule C gross receipts of \$30,127.00, whereas, defendant NADINE J. GRIFFIN then and there well knew and believed, that defendant failed and omitted to disclose on the said 1999 income tax return and attached Schedule C, or any other Schedule C, or otherwise, a substantial amount of gross receipts from her business activity as a salesperson for Global Prosperity.

All in violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL


FOREPERSON OF THE GRAND JURY
CHRISTOPHER MAIETTA
ASSISTANT U.S. ATTORNEY / True Bill, 205 H-10 D.

DISTRICT OF MASSACHUSETTS; July 12, 2005. ^{13/100}

Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK

12:49 P

JS 45 (5/97) - (Revised USAO MA 6/29/04)

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: District of Mass. Category No. II Investigating Agency IRS/CICity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____**Defendant Information:**Defendant Name Nadine J. Griffin Juvenile ☐ Yes ☒ No

Alias Name _____

Address Seminole, FLBirth date (Year only): 1960 SSN (last 4 #): 2839 Sex F Race: Caucasian Nationality: U.S. CitizenDefense Counsel if known: James Krasnoo Address: 23 Main Street, Terrace Level
Andover, Mass.

Bar Number: _____

U.S. Attorney Information:AUSA Christopher J. Maietta Bar Number if applicable N/AInterpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested ☒ Regular Process ☐ In Custody**Location Status:**

Arrest Date: _____

☐ Already in Federal Custody as _____ in _____☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony _____

Continue on Page 2 for Entry of U.S.C. Citations



I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 7/13/05

Signature of AUSA:

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant

Nedie J. Griffin

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>26 USC 7206(1)</u>	<u>USE Filing False Tax</u>	<u>1</u>
		<u>Returns</u>	
Set 2	<u>26 USC 7206(1)</u>	<u>Filing False Tax Returns</u>	<u>2</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: